

EAST BETHESDA CITIZENS ASSOCIATION (EBCA) COMMENTS TO NAVY ON NNMC BRAC DRAFT EIS

JANUARY 28, 2008

EXECUTIVE SUMMARY

East Bethesda Citizens Association (EBCA) appreciates the opportunity to comment on the Department of the Navy draft environmental impact statement (DEIS) for the consolidation of the National Naval Medical Center (NNMC) and Walter Reed Medical Center (WRMC), as per the 2005 Base Realignment and Closure Act (BRAC). EBCA welcomes the new facility, which will be named the Walter Reed National Military Medical Center (WRNMMC) at Bethesda, and supports the important goal of enhancing access to premier health care for our nation's military personnel.

East Bethesda is the residential neighborhood directly south of the base. We are comprised of 1,200+ homes located south of Jones Bridge Road, north of East-West Highway, east of Wisconsin Avenue and west of the Columbia Country Club. The citizens of East Bethesda have enjoyed a long history of supporting the Naval Hospital. In fact, many of our homes, especially on the north side of the neighborhood, were built in the 1930s and 1940s as off-base housing for staff. We look forward to continuing this positive relationship as the base expands to become a world-class medical facility with the important mission of caring for our nation's wounded warriors.

The DEIS seeks to identify impacts and propose mitigations for potential adverse environmental consequences of the mandated expansion. We applaud this first step. EBCA believes, however, that accommodating an expanded medical facility in a congested setting amidst residential, commercial, federal and other non-profit and medical entities requires more careful examination of the potential adverse impacts and their ramifications than is reflected in the DEIS. EBCA's goal is clear: Do it right.

In the attached document, EBCA offers its comments in full for the Navy's consideration in the spirit of collaboration and finding solutions that work for all concerned.

Following are highlights that fall into four major categories, each of which merit special consideration with a response in the final environmental impact statement (FEIS):

ENVIRONMENT

- The FEIS must address the critical issue of airborne particulate matter. We recommend an "Anti-Idling Policy."
- The FEIS must confirm the Navy's commitment to achieving a minimum of LEED Silver building standards in constructing new and replacement facilities.

IMPLEMENTATION

- The DEIS: (a) fails to identify new staff as federal employees or contractors; (b) does not provide a breakdown of patients and visitors; (c) overstates the precision of its traffic survey data; and (d) minimizes attention to mitigation measures for under-capacity roadways that will experience drastic increases in volumes due to BRAC implementation. These areas warrant close attention in the FEIS.
- EBCA requests clarification of the methods used for EIS component impact studies, additional detail about external studies upon which EIS mitigation plans are based, and a full, corrected list of future background development. Accurately predicting future impacts hinges upon accurate FEIS assessments of present conditions.
- EBCA suggests that primary care patients be routed to other facilities in the DC metro area to decrease the overall load at WRNMMC.
- The FEIS should include mitigation measures that can be implemented in the short term and synchronized with the stated timelines for base construction and completion by September 2011.

TRANSPORTATION

- The FEIS must thoroughly assess impacts on all arterial roads. Importantly, Jones Bridge Road was not given due consideration in the DEIS analysis given the predicted increase in usage at the gates. Furthermore, the DEIS does not accurately describe current gate usage on Jones Bridge Road, nor offer effective mitigation for the lines of vehicles waiting to enter the facility from it.
- The DEIS undercounts existing traffic loads and fails to account for vehicles that
 circumvent oversaturated intersections by traveling on secondary residential streets.
 EBCA restates its request that the Navy factor these traffic loads into the FEIS and adjust
 mitigation plans accordingly.
- EBCA recommends numerous specific mitigation measures, including: two "kiss-and-ride"/carpool facilities; improved traffic signage on key roadways; reversible lanes during peak commuting hours; and lengthening the approaches to turns at key, oversaturated intersections.

 EBCA recommends full consideration of dedicated access to the facility from I-495, including use of existing off-ramp infrastructure to provide direct routes of ingress and egress.

COLLABORATION

- EBCA recommends that the Navy seek Defense Access Road (DAR) program funding to help pay for proposed traffic mitigation measures identified in the FEIS.
- EBCA recommends close collaboration between Navy and State planners to ensure that
 major transit infrastructure projects such as the Purple Line and Corridor Cities
 Transitway currently being studied can serve both the new WRNMMC and NIH, two of
 the largest employers in lower Montgomery County.
- EBCA welcomes the formation of a group (e.g., a Community Liaison Committee) that can facilitate an ongoing exchange of information and collaboration to make this expansion work for all concerned.

We believe our concerns are your concerns: developing this area in an environmentally responsible manner; protecting the health and well-being of staff, patients and area residents; safe access to and from the base and around the area; and making this expansion work so that the mission can be fulfilled.

EBCA appreciates the opportunity to comment on these mutually important issues. We look forward to the Navy's response to these and other communities' concerns about the DEIS findings and the implications of accommodating an expanded medical facility amidst the vibrant and diverse community we share.

Sincerely,

Ilaya Hopkins, President East Bethesda Citizens Association

On behalf of the EBCA-BRAC committee and EBCA

EBCA ANALYSIS AND COMMENTS ARE ORGANIZED BY THE SECTIONS IN THE DEIS:

Section 2.5 - Alternatives and Options Considered in the EIS

EBCA Comments on Number of Patients and Visitors to WRNMMC at Bethesda:

- Because the DEIS does not discuss patients specifically, it is hard to understand the
 make-up and transit patterns of the estimated 450,000 new patients and visitors per year
 at WRNMMC. More thought should be given to routing primary care patients to other
 facilities in the DC metro area to decrease the overall load at WRNMMC in Bethesda.
- EBCA requests clarification about how many staff at WRNMMC in Bethesda in 2011 will be federal employees and how many will be contractors. The federal government may have different requirements for office and parking space for contractors.

SECTION 4.0: Environmental Consequences

Section 4.2 - Water Resources Consequences (starts on p. 4-5 of Main Report)

EBCA Comments on Water Resources:

During and after construction, standing water will create a breeding ground for mosquitoes and other disease-carrying insects, which is of special concern in the presence of infectious diseases at WRNMMC. State in the FEIS what steps will be taken to prevent standing water on the base during and after construction.

Section 4.3 - Biological Resources Consequences (p. 4-14 of Main Report)

EBCA Comments on Biological Resources:

- Alternative Two situates the TBI/PTSD ICE right next to the fence directly across from
 the residential neighborhood on Jones Bridge Road. <u>EBCA asks that trees and shrubs be
 planted between that center and the street to improve the aesthetics of this new facility on
 our sight line of the new WRNMMC campus.</u>
- In general, <u>EBCA</u> requests that trees along the perimeter of the campus be preserved as much as possible to create a green buffer between WRNMMC and the surrounding residential neighborhoods.

Section 4.4 - Air Quality Consequences (on p. 4-17 of Main Report, and Appendix B)

EBCA Comments on the DEIS Air Quality Analysis:

We understand from the Air Quality Analysis that Montgomery County, Maryland, the location of NNMC, has been classified by the USEPA as a nonattainment area for PM2.5 and in moderate nonattainment for ozone.

According to the EPA, particulate matter is "particles in the air, such as dust, dirt, soot, smoke, and droplets. Small particles (PM-10 or PM-2.5) have significant effects on human health. Particulate matter is one of the six "criteria" pollutants for which EPA has established national ambient air quality standards."

EPA says that "ground-level ozone (smog) is formed by a chemical reaction between volatile organic pollutants (VOCs) and oxides of nitrogen (NOx) (which are in vehicle emissions) in the presence of sunlight. Ozone concentrations can reach unhealthy levels when the weather is hot and sunny with little or no wind. Ozone at the ground level causes adverse effects on lung function and other adverse respiratory effects. It is one of the six "criteria" pollutants for which EPA has adopted National Ambient Air Quality Standards". Prolonged exposure to high levels of ground level ozone, such as amounts found in non attainment areas like our area, have been found by UCLA scientists to cause asthma in children who play outdoors frequently.

The Air Quality Analysis states that "Air quality impacts are evaluated by the Ambient Air Quality Standards (NAAQS), local requirements, and the rules for conformity. For determining whether a project conforms to the regulations, a proposed project shall not cause or contribute to any new violation of the standard; as well as shall not increase the frequency or severity of any existing violation; and shall not delay timely attainment of the standards. As described above, all estimated concentrations for the no-build and build scenarios are well below the NAAQS standards, and thus no violations were predicted of one-hour or eight-hour NAAQS at any sites."

- The Air Quality Analysis does not name the specific traffic study utilized to determine its
 conclusions. <u>Please clarify which traffic study was used to make these determinations</u>.
 EBCA has serious concerns about the traffic study used to make conclusions in other
 parts of the DEIS and would have similar concerns with the validity of the findings of
 this Air Quality Analysis if the same traffic study data was used here as well.
- 2. We understand from the Air Quality Analysis that under the current EPA policy for addressing PM2.5 precursors, the State or EPA can make a technical demonstration that NOx, VOCs, or ammonia from sources within the State significantly contribute to PM2.5 concentrations in a given nonattainment area (EPA, 2007e). We also understand that at this point neither USEPA nor Maryland have found PM2.5 problems in AQCR 47 to be caused by NOx, VOCs, or ammonia. EBCA seeks to establish whether the Maryland DEP and USEPA have actually conducted an analysis to confirm this, or if there may be reason to conduct a technical demonstration analysis to confirm this finding.

3. According to the Air Quality Analysis report, "[a] federal action that does not exceed the threshold emission rates of criteria pollutants may still be subject to a general conformity determination if the direct and indirect emissions from the action exceed ten-percent of the total emissions inventory for a particular criteria pollutant in a nonattainment area."

Clarify how the general conformity determination is made, and again, what specific traffic study was utilized to inform the report's conclusions that the build scenario will not exceed the ten percent increase in total emissions inventory. EBCA believes that the vehicles driven by many of the 500,000 additional visitors to NNMC annually, the 2,500 additional new staff, and construction-related vehicles will increase NOx emissions to a level of concern for our non attainment area.

EBCA Recommendations:

- EBCA requests that NNMC join the EPA Climate Leaders Program and include patient and staff commuting as one of their Greenhouse Gas sources.
 The URL is: www.epa.gov/climateleaders
- Implement Anti-Idling Policy

To reduce the foreseeable and otherwise unavoidable health risks of diesel and other exhaust, the NNMC should implement and enforce a policy prohibiting idling (an "Anti-Idling Policy") by trucks and construction vehicles waiting at security to enter the campus and also while waiting to operate on campus. The Anti-Idling Policy should be consistent with the anti-idling policy promoted by the U.S. Environmental Protection Agency for The Clean Diesel/Clean Construction program, as part of the EPA's National Idle Reduction Campaign (see http://www.epa.gov/cleandiesel/construction/index.htm).

At a minimum the NNMC's Anti-Idling Policy should state that:

- As a general rule, vehicles should be moving whenever the engine is on.
- The engine should be turned off as soon as possible after arriving at the waiting area.
- The vehicle should not be restarted until it is ready to move.

To ensure that the Anti-Idling Policy works, the policy must be well-known and enforced. <u>The NNMC should adopt the following education and enforcement measures:</u>

- (1) Post signs prohibiting idling in multiple places along roads (such as Jones Bridge Road and MD 355) where vehicles wait. This would also include the side streets, such as Brandt Place, south of Jones Bridge Road, where passenger vehicles currently idle while waiting for NNMC workers to leave the campus.
- (2) Insert contract provisions into government contracts with the companies responsible for vehicles working with the NNMC that require the companies' vehicles to comply with the Anti-Idling Policy;

- (3) Provide the Anti-Idling Policy to all companies using vehicles in working with the NNMC (studies have shown that education on anti-idling is the best method for reducing idling emissions);
- (4) Appoint a particular person or office at the NNMC with responsibility for enforcing the anti-idling laws;
- (5) Establish a mechanism by which citizens witnessing violation of the anti-idling rules can make reports immediately to the responsible office and get an immediate response, i.e., an officer goes out and tells the driver(s) to turn off their engines; and
- (6) Impose fines on a vehicle and/or company owning the vehicle that violates the Anti-Idling Policy, with higher fines imposed on repeated offenses.

Section 4.5 - Noise Consequences (p. 4-26 of Main Report)

EBCA General Comments on Noise:

- What are the locations for the noise monitoring stations and what standardized testing will be used?
- Simply because vehicle noise will "occur in areas already experiencing vehicular noise" and will increase significantly at several key intersections adjacent to residential areas but not enough to produce a 3db increase, does not relieve the Navy from the responsibility of mitigating impact. Please explain how this can be mitigated.

EBCA Comments on Construction Noise:

- <u>Clarify in the FEIS</u>: will all construction traffic entering and exiting the site be directed
 to use North Gate at North Wood Drive and Rockville Pike/MD 355 (p. 4-48), or the
 Grier Road Gate at Jones Bridge Road (p. 4-73), or some combination of those or other
 gates?
- <u>Clarify in the FEIS</u> the claim that neighboring communities to the East and South of NNMC are "unlikely to be impacted by the noise from construction activities (DEIS, p. 2-22)." How was this determined and what monitoring activities will be used to confirm that this is so?

EBCA Comments on Helicopter Noise:

The DEIS estimate of increased noise from helicopters is based on a marginal assessment
for the first five months of 2007, and the term "significant" is used subjectively. <u>Provide
a recent study that supports the DEIS statement that there will be no increased noise
effect with the additional helicopter trips.</u>

• Why is periodic helicopter noise of a short-term and unpredictable duration not considered an adverse impact?

Section 4.6 - Utility Infrastructure (p. 4-32 of Main Report)

EBCA Comments on Utility Infrastructure:

- Can WSSC accommodate the increase in waste water from the site? How will this be monitored? Document this in the FEIS.
- Can local utilities accommodate the increased demand for natural gas and water distribution? <u>Provide documentation</u> from Pepco and WSSC in the FEIS.

Section 4.7 - Transportation Consequences (Sec. 4.7 of Main Report and App. C):

EBCA General Comments on Transportation:

We have many concerns about the transportation study, the analysis, and the DEIS conclusion that additional traffic brought by the expansion will have little impact on area roadways beyond what they are likely to experience anyway.

- EBCA is concerned that the traffic analysis contained in the DEIS does not reflect the reality of the situation that we experience daily. The discrepancy with prior traffic studies highlights this concern. A comparison of existing traffic volumes for 13 Montgomery County intersections surveyed by the DEIS (2007) and M-NCPPC (2006) suggests that the DEIS may have consistently underestimated current traffic volumes by 17% on average. Moreover, the DEIS estimates are lower than estimates collected 1 5 years ago. The Navy must use rigorous survey methods that provide reliable and valid traffic volume estimates. The FEIS should explain the basis for the discrepancies between its traffic study and the earlier M-NCPPC studies, or rely on the higher traffic counts of the prior studies.¹
- The Navy should state clearly in the final EIS that no transportation plans should be
 retained or approved that would in any way whatsoever increase traffic through the East
 Bethesda neighborhood or allow parking of non-resident vehicles within that
 neighborhood. This will protect the privacy and integrity of the East Bethesda
 community.
- The Navy should design and construct a roadway system inside the base with the goal of controlling inbound/outbound traffic and reducing queuing on exterior arterial roads. For

¹ Maryland-National Capital Parks and Planning Commission (2006). Highway Mobility Report 2006 – Final Draft. http://www.mc-mncppc.org/Transportation/hmr/index.shtm. Accessed on 12/29/07.

example, vehicle inspection stations, such as the one recently built by NIH, should be constructed inside the NNMC base in a manner that avoids congestion on adjacent key roadways caused by cars and trucks lining up, waiting to be cleared to enter the base.

- While the Navy received background development information from Montgomery County, it did not include all the approved development in the nearby area. For example (p. 4-73 of the Main Report), the DEIS considered both NIH and Bethesda-Chevy Chase (BCC) Master Plans and concluded that commuter traffic will not increase as a result of the NIH Master Plan, but it does not appear to have accounted for the new NIH visitor center opening in the second quarter of 2008. That visitor center will add vehicles throughout the day to Rockville Pike/MD 355 northbound via Battery Lane. EBCA requests that the Navy use a complete and current list of planned developments in the Bethesda area in its traffic analysis for the FEIS.
- Cut-through traffic in residential areas: Notably, the DEIS estimates for selected intersections (e.g, Intersection #12, Rockville Pike and Jones Bridge Road) fail to account for drivers that avoid above-capacity intersections by cutting through residential streets, a problem which we have already been working with the county for some time to mitigate. In one case, this may underestimate CLVs by >10% (e.g., North Chelsea Lane's recent traffic survey estimating ~200 vehicles/hour during the PM commute use residential roads to avoid Intersection #12)). This was left out of the DEIS transportation study even though this particular situation was brought to the Navy's attention during the scoping period. The FEIS should address this issue.
- The transportation study fails to reflect the fact that increased traffic at already-failing intersections has a significant impact on traffic. Instead, the study adopts the position that if an intersections is already "failing," the increased BRAC impact need not be accounted for. The FEIS should address mitigation measures for all intersections at which BRAC will have a significant impact. The Navy acknowledges that "incremental effect could add to a general level of traffic that would be noticeable and inconvenience other motorists" (p. 4-78 of the Main Report), but it needs to be more forthright on the cumulative impact that the traffic will have both during and beyond peak hours. Adjusted estimates suggest that NNMC expansion will have an unusual and considerable impact on traffic congestion by year of implementation.
- EBCA urges more attention be paid to traffic mitigation measures that can be implemented in the very short term to deal with the stated time line of construction, as well as longer term operations. Short term, easy-to-achieve mitigation measures include traffic calming measures such as adding a police presence at key intersections during peak hours, refining signalization, adding shared turn and through lanes, and cooperating on ongoing studies. At all signaled intersections at and around NNMC, EBCA requests the use of "smart" traffic lights and traffic volume monitors to determine whether vehicles are actually waiting or not. For example, we have often observed a green light for traffic exiting NIH at Center Drive but no cars actually exiting. By enabling signals to better address actual demand at each cycle, traffic may flow more efficiently throughout the area.

- The Navy must seriously consider long-term traffic mitigation measures like the I-495 Slip Ramp.
- The Navy has indicated a willingness to provide some land along MD 355 to the State if
 that roadway needs to be widened. <u>EBCA requests an easement to the State along the
 north side of Jones Bridge Road, as well, where the land could be used for: a dedicated
 lane for staging and queuing, a "kiss and ride" drop-off/pick-up facility, and an ADAcompliant sidewalk with buffer area from roadway.
 </u>
- A robust Transportation Demand Management program must be in place soon to be relevant to the traffic mitigation measures under consideration.
- The DEIS too quickly and erroneously rejects the possibility of Defense Access Road (DAR) program funding to help implement proposed traffic mitigation measures. The conclusion in the DEIS that the impacts of NNMC's expansion do not "meet the criteria for inclusion in the DAR program" is based on the DEIS' erroneous assumption that only a doubling of existing traffic qualifies for such funding (Page 4-50). In fact, the applicable eligibility criteria for DAR program funding merely note that a sudden doubling of traffic is one circumstance that would generally be considered appropriate for DAR funding. See FHWA, Federal-Aid Policy Guide ("FAPG"), Non-Regulatory Supplement, Attachment 2, 23 C.F.R. Part 660, Subpart E. The eligibility criteria do not, however, set forth any such absolute requirement, and no such requirement is found in the governing statute or regulations.² To the contrary, the guiding principle of the DAR program is that it is intended to provide a means for the Department of Defense to pay a fair share of public highway improvements required as a result of a sudden or unusual defense-generated traffic impact. In light of the unique nature of this BRAC action (relocating into a heavily populated and trafficked urban area), it is clear that the resulting traffic impacts are "unusual" and the Navy should consider all possible interpretations of DAR eligibility. It is in our mutual interest to secure such funding, as it would help ensure smooth traffic flows to and from what will be the nation's premiere military medical facility and a critical component in responding to a mass casualty event in the Washington, D.C. area.

EBCA Comments on Traffic Analysis (Main Report and Appendix C):

EBCA is concerned that the DEIS traffic analysis does not reflect the reality of the situation that neighbors and area commuters experience daily. Evidence suggests that the traffic survey conducted as part of the DEIS study lacks sufficient methodological rigor to inform transportation planning by County, State, and Federal officials to accommodate NNMC expansion.

In 2006, the Maryland-National Capital Park and Planning Commission (M-NCPPC) released a

² AR 55-80 incorrectly states that the doubling of traffic is a requirement; that same document, however, recognizes that the applicable criteria are set forth in the FAPG.

survey of the 10 most congested intersections in Montgomery County. The study collected critical lane volumes (CLV), which measure traffic density by counting the number of vehicles per hour, for 13 intersections also examined in the DEIS. A comparison of the DEIS and M-NCPPC (2006) traffic mobility report data yields the following observations:

- 1. The DEIS traffic surveys were conducted in September/October, 2006 and March/April 2007. The M-NCPPC surveys were conducted 1 5 years <u>earlier</u> (i.e., 2002 2005).
- 2. The DEIS underestimates existing traffic volumes published by M-NCPPC for 13 common intersections by 16.5% on average. The size of these discrepancies is considerable, ranging from 2.5% to -43.3%.
- 3. The DEIS estimated that two of 27 intersections (7%) operate now at unacceptable levels of service (CLV>1600), whereas M-NCPPC (2006) found that four of 13 common intersections (31%) were found to function at unacceptable levels. In other words, the DEIS reported only a quarter as many common intersections as failing as were noted by the County 1 − 5 years before.
- 4. Of the 13 common intersections, only two (15%) show discrepancies that suggest that traffic has increased in the 1 5 years between the surveys. This means that the DEIS reported consistently lower CLVs for 85% of common intersections. If the figure were closer to 50%, one might accept this as random variability. Instead, this suggests a pattern of non-random, systematic bias in the DEIS survey methods.
- 5. There may be several possible sources of systematic error that may account for observed discrepancies between the DEIS and M-NCPPC data. For example, the M-NCPPC conducted its surveys in mid-week (i.e., Tues Thurs). If the DEIS surveys were conducted on other, lower traffic volume days (e.g., weekends, federal or school holidays), this could produce differences of the magnitudes observed. Similarly, discrepancies could be due to the behavior of surveyor teams assigned to conduct field observations at key intersections. A lack of training, reliability checks, or attention to detail could account for the apparent undercounts. The DEIS offers very little detail about the methods it used, such as the confidence intervals around point estimates of traffic volumes, which could increase confidence in the rigor of its study.
- 6. The consequences of the DEIS underestimation of area traffic are important:
 - If one adjusts upward by 17% the DEIS estimates of <u>existing</u> traffic during the evening peak commute, the number of failing intersections (CLV>1600) increases by 200% from 2 to 6 (see DEIS, Table 4-12).
 - Using the DEIS predictions of 4.2% average increases in peak evening traffic loads under the No Alternative scenario, the estimated number of failing intersections by 2011 increases by 100%, from 4 to 8.
 - Worse still, using the DEIS predictions of 7.5% average increases in peak evening

traffic loads under <u>Alternatives 1 or 2</u>, the estimated number of failing area intersections following the NNMC expansion increases by 150% to ten, from the four that the DEIS predicts. It is noteworthy that both the DEIS estimates and these adjusted estimates show that BRAC implementation is expected to increase the number of failing intersections in an already congested area by 25% or more, which represents an unusual impact.

EBCA requests that the Navy provide more detail in the FEIS about how the surveys were conducted, including the dates and days of the week on which surveys were conducted, so that the public can better compare the EIS findings to Montgomery County data. EBCA also requests that the Navy explain the discrepancies between the Montgomery County traffic data and those reported in the DEIS, with particular attention given to the reliability and validity of the assessment methods used. EBCA also requests clarification of which area intersections were added to the original DEIS study at the request of Montgomery County officials, as it is possible that the use of different survey teams or methods could explain the observed discrepancies. Finally, EBCA requests clarification of how cut-through traffic (i.e., vehicles that attempt to circumvent oversaturated intersections such as Rockville Pike & Jones Bridge Road by traveling secondary residential streets) impacts the DEIS estimates for existing and future traffic volumes. Several local communities, including EBCA, have conducted formal and informal surveys which show that cut-through traffic accounts for 10 – 15% of vehicles that would otherwise travel through selected intersections during PM peak hours. There is no evidence that the DEIS factored this into its traffic surveys, despite being advised by communities to do so.

EBCA believes that the March/April 2007 portion of the DEIS traffic study may have been conducted during spring break week for schools other than Montgomery County Public Schools and during a period of Congressional Recess, which would result in lower traffic counts than other times. Is this true?

Section 4.7.3 - Potential Measures to Address Impacts from NNMC Actions (beginning on p. 4-48 of Main Report) -- Some which could be implemented by the Navy, and some which would be State and County responsibilities.

EBCA Comments on Potential Improvements for NNMC:

- EBCA requests that the FEIS explore enhanced synchronization of traffic signals and "smart" traffic signals (monitoring traffic volume at each cycle) in the immediate area to facilitate smoother traffic flow through this congested corridor.
- EBCA recommends the implementation of reversible lanes as a possibility to help manage increased loads during peak commuting hours.
- EBCA recommends the provision of two new "Kiss and Ride" facilities at the following locations. The NNMC shuttle (App. C, p. 32) should be routed to include these "kiss and ride" facilities:

- MD 355 near the pedestrian bridge/tunnel, perhaps by the gate at South Wood Drive.
- Jones Bridge Road at the University Road gate, with a new U-Turn. After dropping off their riders, vehicles could then proceed along Jones Bridge Road westbound to MD 355, or U-turn back onto Jones Bridge Road eastbound. Pedestrians could then board a shuttle inside WRNMMC to get to their destination.

EBCA comment on South Wood Road Gate:

- The potential bridge or tunnel at MD 355/Rockville Pike crossing from NIH to NNMC is a key element in the plan to link Suburban, NIH, and NNMC in a mass casualty event, and must be large enough to accommodate emergency vehicles. Therefore, the EIS should give greater prominence to this proposal. All other modifications to this stretch of Rockville Pike/MD 355 -- including the gate at South Wood Road, "kiss and ride" facilities, and any widening of MD 355 -- must be designed around the security requirements of this bridge/tunnel. EBCA recommends that the Navy review the preliminary consultant report on this bridge/tunnel, which is expected in February, and incorporate the reports' conclusions into the FEIS.
- EBCA requests that the bridge/tunnel be designed to allow any pedestrian to use it to
 cross MD 355, with the security checkpoint for accessing WRNMMC beyond the
 entrance to the bridge/tunnel. The bridge/tunnel should be designed so that in time of
 emergency, the WRNMMC gates could be swung out to connect to the bridge/tunnel –
 thereby restricting regular access to the bridge/tunnel only when absolutely necessary.

EBCA comments on Jones Bridge Road intersections (Gunnell Road Gate/Navy Exchange Gate – DEIS Intersection #13; Grier Road Gate/Navy Lodge Gate – DEIS Intersection #14; University Road Gate/USUHS Gate – DEIS Intersection #15):

• The DEIS proposed mitigation measure for the Jones Bridge Road intersections (#13-15) is listed as "a safety and security analysis is being conducted by DOD to improve security, safety, improve queuing on-site and reduce Jones Bridge Road queuing[...]" (p. 4-49 of Main Report). However, an ongoing study is not a proposed mitigation measure at all. The referenced study should have been conducted as part of the EIS process so that the results of the study, and any recommendations, could be commented on. The public should have an opportunity to comment on the results of the study and any proposed actions the Navy intends to take as a result. As a result of the lack of a study, there is no analysis with respect to the other measures proposed at these gates. The referenced study should be completed before the final EIS is issued so that its results, and public comments on its proposed actions, can be incorporated into the final EIS.

- The DEIS notes that the BRAC will increase traffic on Jones Bridge Road at intersections #14 & 15 by 13-20% (Pages 4-45 and 4-46). (It is entirely unclear how the impacts on the two intersections, which are very close to each other, can be so varied.) Because the intersections are not "failing" there is no discussion in the DEIS about how to mitigate this substantial impact on traffic. The FEIS should address proposed mitigation measures for this substantial increase in traffic.
- The Transportation Study (Appendix C) states that the Navy Lodge Gate (i.e., Grier Road & Jones Bridge Road, Intersection #14) is open to outbound traffic only from 2:00-6:00 pm, and closed at all other times (p. 11 of Appendix C). Elsewhere, the Transportation Study recognizes that "during 2007 NNMC has used both [the] University Road Gate and Ithel Grier Road Gate for Truck Traffic. This is to evaluate the impact on safety and the possibility of creating a new security truck inspection station at other locations or using the truck inspection station at NIH" (p. 21 of Appendix C). This last sentence is apparently a reference to the fact that for at least several months the Grier Road Gate has been open all day long for both inbound and outbound traffic, and not just for outbound traffic from 2:00-6:00 pm as noted elsewhere. Because of the short internal road, the security on the base, and the timing of the lights, every morning there is a line of trucks waiting to enter the base on Jones Bridge Road in both directions. The DEIS does not account for the fact that the Grier Road Gate has been open to inbound traffic and does not analyze or discuss the impact that the opening has had (e.g., the line of trucks on Jones Bridge Road (in both directions) waiting to enter the base every morning). The DEIS therefore does not accurately reflect current gate usage or appropriately address how to mitigate the impacts created by allowing trucks to use these gates. The FEIS should address these issues.
- The DEIS proposes to use the Grier Road Gate for both inbound and outbound traffic, and to widen Grier Road to allow for this, with two outbound lanes and one inbound lane (p. 4-49 of Main Report). There is no analysis as to why this proposal is being made, what anticipated harms it is intended to mitigate (e.g., what traffic it is seeking to divert to Grier Road and why), what impact such a change would have (e.g., queuing on Jones Bridge Road, additional Jones Bridge Road traffic), or what additional measures are needed to mitigate such harms (e.g., the need to provide for an on-base truck waiting area and/or to extend the right- and left- turn lanes into the base). There is no reason given for why two outbound lanes are proposed (one dedicated left-turn lane and one dedicated right-turn lane). Outbound base traffic does not get stopped for inspection, and since there is no facing street, left-turn traffic should move freely out of the base on a green light. Conversely, inbound traffic gets stopped, resulting in long lines on Jones Bridge Road. The FEIS should provide the analysis supporting the proposal to use the Grier Road Gate for both inbound and outbound traffic. EBCA recommends that if Grier Road is widened, then it should be two lanes inbound and one lane outbound, to minimize truck queuing on Jones Bridge Road. Alternatively, the middle lane could be reversible: inbound in the a.m. and outbound in the p.m.

EBCA Comments on DAR funding eligibility:

As discussed above, the DEIS summarily and erroneously concludes that the expected traffic impacts of NNMC's expansion do not qualify for DAR funding. As noted, this is not the case, as the governing law and regulations contain no hard-and-fast rules as to what qualifies as an "unusual" impact. See CRS Memo, available at

www.montgomerycountymd.gov/content/exec/brac/pdf/dar-crs_rept-dar_program-011108.pdf. This BRAC action and its impacts readily qualify as unusual because of the already congested urban area in which the expansion is to take place. In light of this heavy congestion, traffic impacts that might appear moderate when viewed solely as a percentage increase can in reality have a severe impact. The inability of patients and staff to reach the hospital in a timely manner may create significant operational problems for the Navy. The addition of ~2,500 additional personnel and the doubling of patient visits per year will contribute to a 150% increase in the number of failing intersections in the areas surrounding the base at the year of BRAC implementation. This statistic alone suggests that the traffic impacts are unusual and severe. EBCA requests closer scrutiny of the applicability of DAR to NNMC expansion, and urges the Navy to seek DAR funding, in light of the evidence that the base's expansion will have an unusual impact on an already congested area.

Section 4.7.3.2 — Potential Roadway and Intersection Improvements — under the jurisdiction of either Montgomery County or the State of Maryland — (p. 4-49 of the Main Report):

Rockville Pike/MD 355 at Jones Bridge Road (DEIS Intersection #12) - (p. 4-50 of Main Report)

EBCA Recommendations for Intersection #12:

- Extend the length of the current right-hand turn lane on MD 355 northbound approaching Jones Bridge Road to accommodate the volume of traffic trying to turn east onto Jones Bridge Road.
- Convert a northbound lane of MD 355 to a shared thru and right-hand turn lane (for eastbound traffic) to facilitate more traffic using the intersection rather than cutting through the neighborhood.
- Convert a southbound lane of MD 355 to a shared thru and left-hand turn lane (for eastbound traffic).
- Find creative ways to keep traffic moving along MD 355 northbound. According to Figure 6 (p. 20, Appendix C), traffic on MD 355 northbound begins to slow at Battery Lane and does not move more easily until Cedar Lane. This stretch can take upwards of 20 minutes to travel due to vehicles exiting both NNMC and NIH during the PM peak hours. For example, the proposed bridge/tunnel over MD 355 could reduce the need for vehicles to wait for pedestrians and cyclists crossing MD 355; pedestrians now crossing MD 355 at Jones Bridge Road could be funneled to that bridge/tunnel as well. "Smart"

traffic lights could monitor traffic volumes at the intersections and adjust traffic signals at each cycle.

• Consider impact of traffic congestion on nearby residential areas that often experience high volumes of traffic during peak hours. The DEIS estimate for Intersection #12 (Rockville Pike and Jones Bridge Road) fails to account for drivers that avoid above-capacity intersections by cutting through residential streets, a problem which EBCA and others have already been working with the county for some time to mitigate. In the case of Rockville Pike and Jones Bridge Rd, the DEIS may underestimate CLVs by >10% (e.g., North Chelsea Lane's recent traffic survey estimating ~200 vehicles/hour during the PM commute turn into the EBCA neighborhood and thus bypass this intersection). This was left out of the DEIS transportation study even though this particular situation was brought to the Navy's attention during the scoping period. The FEIS should account for this potential increase in traffic in the event the County restricts through traffic to this and other neighborhoods.

Rockville Pike/MD 355 and South Drive (DEIS Intersection #11):

EBCA comment:

EBCA has commented above (see "South Wood Drive Gate") on the planned bridge/tunnel at MD 355 crossing from NIH to NNMC. If a bridge is built at this location, it would be an opportunity for an attractive "Gateway to Downtown Bethesda." <u>EBCA requests that the Navy consult with Bethesda-Up and the Central Business District in the aesthetic design of a bridge</u>.

Old Georgetown Road/MD 187 at West Cedar Lane (DEIS Intersection #6):

EBCA Comments on Intersection #6:

1.) West Cedar Lane westbound approaching Old Georgetown Road/MD 187: the DEIS recommends eliminating parking along Cedar Lane eastbound to provide an additional receiving lane for traffic turning from Old Georgetown Road (Appendix C, p. ix).

EBCA recommends the following:

- Clarify in the FEIS whether allowing four lanes on West Cedar Lane can be accomplished solely by eliminating parking, or whether it would also require eliminating the center turn lane. Clarify whether the assessment of improved traffic flow along Cedar Lane with four lanes accounts for the turning traffic which currently has use of the center turn lane to access NIH and the residential area.
- Eliminate parking along all of Cedar Lane westbound to lengthen the approach to the right-turn lane onto Old Georgetown Road northbound.

- Enforce parking laws in residential neighborhoods daily.
- Add a separate right-turn lane on Cedar Lane westbound as it approaches Old Georgetown Road.
- 2.) Old Georgetown Road/MD 187 reversible lane: the DEIS states that the Bethesda Central Business District (CBD) Master Plan (July 1994) recommends implementing a peak period reversible lane on Old Georgetown Road from Woodmont Avenue northward to north of West Cedar Lane when future traffic conditions warrant this improvement (Appendix C, p. 39).

EBCA supports this recommendation: The traffic analysis appears to indicate that traffic conditions do warrant this improvement now.

- 3.) The DEIS recommends an additional left-turn lane on Old Georgetown Road/MD 187 southbound approaching Cedar Lane and eliminating parking along Cedar Lane to provide an additional receiving lane (Appendix C, p. ix). <u>EBCA supports this recommendation, but also recommends the following:</u>
 - Improve signage along Old Georgetown Road southbound to make clear that vehicles can access NNMC via Cedar Lane eastbound to Rockville Pike southbound.
 - Improve signage along I-495 eastbound and westbound to make clear that vehicles can access NNMC via THREE southbound exits: Old Georgetown Road, Rockville Pike, and Connecticut Avenue.
 - Improve signage along I-270 to make clear that vehicles can access NNMC via Old Georgetown Road southbound.

Connecticut Avenue/MD 185 at Jones Bridge Road (DEIS Intersection #16):

EBCA Comments on Intersection #16:

The DEIS estimates that this BRAC action will increase the CLV at the peak PM hour by 4%. This is a modest increase, but since a CLV of 2,000 means traffic is at a standstill, and the CLV is virtually at 2,000 in the PM peak hour even before the BRAC action, there is no margin for any CLV increase at Intersection #16. Therefore, it is incumbent on the Navy to address mitigations here.

1.) Jones Bridge Road eastbound at Connecticut Avenue/MD 185 and Kensington Parkway: The DEIS recommends adding a left-turn lane along Jones Bridge Road eastbound approaching Connecticut Avenue (see Appendix C, p. x). EBCA supports this recommendation, but also recommends the following:

- Add a second lane to the I-495 eastbound access ramp off of Connecticut Avenue northbound. This would allow vehicles turning left from Jones Bridge Road eastbound to move more smoothly onto the I-495 ramp. Currently, vehicles overuse the shared left-turn lane on Jones Bridge Road and under-use the separate left-turn lane on Jones Bridge Road because, once on Connecticut Avenue, they must immediately merge all the way to the right to get onto the I-495 eastbound ramp. Overuse of the shared left-turn lane on Jones Bridge Road blocks vehicles on the approach to Connecticut Avenue northbound, exacerbating under-use of the separate left-turn lane on Jones Bridge Road. Adding a third left-turn lane to Jones Bridge Road without also widening the I-495 access ramp to two lanes will not allow all the left-turn lanes on Jones Bridge Road to be used to capacity.
- Lengthen the approaches to the left-turn lanes on Jones Bridge Road eastbound.
 Currently, overuse of the shared left-turn lane on Jones Bridge Road blocks vehicles on Jones Bridge Road eastbound as they approach Connecticut Avenue who might otherwise prefer to use the separate left-turn lane on Jones Bridge Road. Lengthening the approach lanes on Jones Bridge Road would allow the separate left-turn lane on Jones Bridge Road to be used to greater capacity and reduce the PM backup along Jones Bridge Road eastbound.
- Improve signage on Jones Bridge Road eastbound to make clear that two of the three left-turn lanes on Jones Bridge Road will BOTH access the two-lane I-495 eastbound ramp.
- 2.) Connecticut Avenue southbound at Jones Bridge Road:

The DEIS recommends providing a separate right-turn lane along Connecticut Avenue southbound approaching Jones Bridge Road (see Appendix C, p. x). EBCA supports this general recommendation, although the specifics of this recommendation are unclear to us. EBCA recommends the following:

- Extend the ramp from Exit 33 (I-495) onto Connecticut Avenue southbound all the way to Jones Bridge Road so that vehicles exiting from I-495 and intending to turn right onto Jones Bridge Road need not merge with the Connecticut Avenue southbound traffic.
- Improve signage along I-495 to make clear that vehicles can access WRNMMC from three southbound exits: Connecticut Avenue, Rockville Pike, and Old Georgetown Road.
- Improve signage along Connecticut Avenue southbound to make clear that vehicles can access WRNMMC via Jones Bridge Road westbound.

 Study the feasibility of adding a lane to the Exit 33 I-495 exit ramp (from the Inner Loop eastbound heading towards Connecticut Avenue southbound); situate the additional lane through North Chevy Chase park and directly onto the base, allowing WRNMMC visitors and staff to bypass Jones Bridge Road altogether

I-495 Beltway Slip Ramps into WRNMMC Campus: (Section 4.7.4.2, p. 4-52 of Main Report; and in Appendix C: p. 68, and Figure 18, p. 54).

EBCA Comments on Slip Ramp Analysis:

1.) EBCA Comments on Outbound PM Trips from NNMC:

Figure 17 (Appendix C, p. 53) shows that 45% of the outbound PM trips use Rockville Pike northbound for a short distance, but it does not explain why so many outbound PM trips then turn onto West Cedar Lane rather than continue on Rockville Pike northbound past Cedar Lane (intersection #5).

Figure 18 (Appendix C, p. 54) shows that more outbound PM trips would head eastbound with a Slip Ramp than without one, and fewer trips would head westbound in the evening. Why would an eastbound Slip Ramp reduce the number of outbound PM trips on Cedar Lane westbound from 30% to 15%?

This DEIS analysis also suggests that, with the addition of a Slip Ramp to I-495 eastbound, more outbound PM trips would head northbound on Rockville Pike (from 10% to 15%). Why would an eastbound Slip Ramp increase the number of northbound trips on Rockville Pike?

The FEIS must clarify the analysis of outbound PM trips with and without an I-495 Slip Ramp. Explain in the FEIS why an eastbound Slip Ramp would reduce trips on Cedar Lane westbound and increase trips on Rockville Pike northbound.

2.) EBCA comments on Inbound AM Trips to NNMC:

Figure 17 (p. 53, Appendix C) shows that at least 40% of the inbound AM trips will use the Jones Bridge Road entrances into NNMC. EBCA notes that this proportion could be even higher if inbound AM trips from Rockville Pike northbound turn right at Jones Bridge Road to use the Gunnell Road entrance (or other modified entrances along Jones Bridge Road).

Figure 18 (p. 54, Appendix C) shows that with a proposed I-495 Slip Ramp to the Inner Loop (eastbound), the portion of inbound AM trips using the proposed Slip Ramp would come from two roads: West Cedar Lane (which would drop from 30% to 10% of inbound AM trips), and Rockville Pike southbound (which would drop from 10% to 5% of inbound AM trips). The DEIS finds that the proposed Slip Ramp would not change inbound AM trips along Jones Bridge Road.

EBCA recommends that the FEIS examine the feasibility of the following:

- The problem of having no turn-around on the Slip Ramp back onto I-495 for vehicles rejected at the gate could be rectified in two ways:
 - 1. construct a road leading to the Exit 33 off-ramp to Connecticut Avenue, or
 - 2. construct a road southbound to Jones Bridge Road along the campus' eastern perimeter.
- As an alternative to the Slip Ramp, add a lane to the Exit 33 I-495 eastbound ramp onto Connecticut Avenue southbound; situate one exit-ramp lane through North Chevy Chase park and directly onto the base, allowing WRNMMC visitors and staff to bypass Jones Bridge Road altogether.
- The DEIS states the FHA would likely preclude the addition of an interchange without making clear whether the possibility was fully pursued. Do all the other interchanges along I-495 meeting FHA requirements? Is there any precedent for exceptions to the general FHA rule?
- If the Navy encouraged or required staff and patients to use the Slip Ramp entrance, the
 effect of the Slip Ramp on traffic patterns could be much greater than the 25% of trips
 cited in the DEIS.
- Given the evidence for the large portion of inbound AM trips along Jones Bridge Road, request an easement from the base to allow the construction of a "kiss and ride" dropoff/pick-up facility on the north side of Jones Bridge Road. This facility should also allow vehicles to U-turn heading back along Jones Bridge Road.
- The FEIS must consider the role of a Slip Ramp in an evacuation scenario such as a mass casualty event. The Slip Ramp could play a critical role in allowing more options for access to and egress from WRNMMC, NIH and Suburban Hospital in a time of emergency, when area roads would become even more gridlocked.

Fringe Parking (Appendix C, p. 69): As stated in the DEIS, two parcels of State-owned land within the northeast quadrant of the I-495 at Connecticut Avenue Interchange could be improved as fringe parking lots for WRNMMC employees.

EBCA Comments on Fringe Parking:

- In lieu of fringe parking within a mile of the facility, the FEIS should focus on mediating traffic at its origin, such as providing parking at transit stops along I-270.
- In lieu of fringe parking, the Navy could encourage carpooling by providing at least one "kiss and ride" facility for vehicles to drop-off/pick-up WRNMMC passengers without the car entering the base. Currently, vehicles idle in nearby neighborhoods while waiting for people to walk off base; therefore, these drop-off/pick-up points should be located near gates that can handle pedestrian access.

Pedestrian Improvements (see Appendix C, p. xii and p. 69):

EBCA Comments on Pedestrian Improvements:

- We need facilities for vehicles to pull over and drop-off/pick-up NNMC passengers
 without the car entering the base ("kiss and ride" facilities). Currently, vehicles idle in
 nearby neighborhoods while waiting for pedestrians to walk off the base. This indicates
 that such drop-off/pick-up points should be located near gates that can handle pedestrian
 access. The shuttle (App. C, p. 32) should be routed to include the "kiss and ride"
 facilities.
- Construct better sidewalks on the north side of Jones Bridge Road and funnel pedestrian traffic to that side of the roadway. The pedestrian access should tie easily to bus stops and new "kiss and ride" facilities. As pedestrians walk on Jones Bridge Road west towards MD 355, they should be encouraged to cross over to the Metro at the new bridge/tunnel, thereby minimizing the pedestrians crossing MD 355 at grade at oversaturated intersections.

Bicyclist Improvements (see Appendix C, p. xii and p. 69):

EBCA Comments in Bicyclist Improvements:

- EBCA supports better pedestrian and bicycle access, including a way for cyclists to get from the west side of Rockville Pike/MD 355 on to the base by bridge or tunnel without having to cross at grade. Specifically, we request that the Navy and NIH include bicycle access in the design of the bridge/tunnel between NIH and NNMC at MD 355.
- Convenient and secure bicycle 'parking' is a key element in encouraging bicycle commuters. EBCA requests that the final EIS include improved on-campus bicycle parking facilities.
- All storm water grates in the roadway must be designed so that bicycle wheels cannot fall
 into them.
- EBCA recommends that all NNMC gate improvements include bicycle access in the gate design.

Transit Improvements (Appendix C, p. xii and p. 69):

EBCA Comments on Transit Improvements:

- As mentioned in our comments above, the pedestrian connection (bridge or tunnel) at the Rockville Pike crossing from NIH to WRNMMC is much more than a personnel convenience: it must be large enough to accommodate emergency vehicles traveling between Suburban, NIH, and WRNMMC in a mass casualty event. Therefore, the final EIS should give greater prominence to this feature. All other modifications to this stretch of Rockville Pike/MD 355 (road widening, extra turn lanes, "kiss and ride" facilities, gates) must be designed around this critical bridge/tunnel. EBCA recommends that the Navy review the preliminary consultant report on this bridge/tunnel, which is expected in February, and incorporate the reports' findings in the FEIS.
- EBCA recommends that the Navy study the I-495 Slip Ramp in the context of the plan to link Suburban, NIH and WRNMMC in a mass casualty event. The FEIS must examine this bridge/tunnel in a broader context than simply transit or pedestrian improvements.
- EBCA supports every effort to make the Metro Red Line more accessible. <u>EBCA</u>
 requests that the Navy examine ways to improve parking availability at remote Red Line
 stops along I-270 as a means to improve transit accessibility.
- EBCA requests that the Navy examine the feasibility of a covered walkway for
 pedestrians starting inside the gate at South Drive (adjacent to the Metro and bus drop-off
 areas) leading to the WRNMMC medical buildings. If pedestrians find the walk from the
 Metro to the buildings more pleasant in all weather conditions, they are more likely to use
 transit. A covered walkway may also provide security benefits.
- The DEIS does not specify which portion of the estimated 2,850 persons who arrive at
 the Metro's Medical Center Red Line stop each weekday are heading to NNMC vs. NIH.
 This lack of detail may lead to erroneous conclusions about, for example, how to modify
 the gate at South Drive and how to address pedestrian traffic across MD 355. EBCA
 requests that the Navy include this breakdown in the FEIS.
- The DEIS does not specify the proportion of NNMC staff and visitors who use public transportation (Metro or bus). <u>EBCA requests that the Navy provide this estimate in the FEIS.</u>

Appendix C-Section 4.6: Transportation Management Plan (p. xiii and p. 70):

EBCA Comments on TMP:

EBCA strongly supports the objective of the Transportation Management Plan (TMP) to reduce the number of single occupancy vehicles coming on to the base, but we are concerned that the TMP will be completed too late in the EIS process to fully inform the transportation analysis.

Section 4.9 - Land Use and Zoning Consequences (p. 4-62 of Main Report)

EBCA Comments on Land Use and Zoning:

- The FEIS must plan for future housing needs of staff living off base, as well as patients and visitors requiring extended stays.
- The FEIS should recommend incentives for WRNMMC employees to live near Metro stations and commute by public transportation.
- The FEIS should examine circulation patterns of employees and visitors on the base in both alternatives to ensure that there is good flow and movement. A shuttle around the improved perimeter road could facilitate circulation.

Section 4.12 - Cumulative Impacts (p. 4-72 of Main Report)

EBCA Comments on Foreseeable Future Projects and Truck Access and Circulation:

- EBCA requests a fuller discussion of plans for truck access to WRNMMC in the FEIS.
 Will construction vehicles be handled differently from other trucks? Will trucks queue up inside the base, or along Jones Bridge Road? If along Jones Bridge Road, the Navy should offer an easement along the north side of Jones Bridge Road to create a queuing lane, thereby allowing through traffic to proceed smoothly.
- EBCA requests that the Navy achieve LEED Silver building standards in the construction
 of all future facilities at WRNMMC per the August 4, 2006 Memorandum from the
 Assistant Secretary of the Navy directing as such and adhere to Executive Order:
 Strengthening Federal Environmental, Energy and Transportation Management signed
 into law January 24, 2007.

Appendix A: Correspondence and Public Involvement

EBCA Comment on Appendix A:

In "Attachment 5: List of Community Associations that were mailed the Notification of the Public Scoping Meetings," the East Bethesda Citizens Association (EBCA) is not included in the list; in fact, EBCA was not officially notified of the scoping meetings.

The DEIS lists an impressive array of potential TMP strategies, but it does not indicate which will be implemented. <u>EBCA recommends the following</u>:

- State in the FEIS when the TMP update will be completed.
- State in the FEIS which, if any, of these potential TMP strategies will be implemented at WRNMMC.

EBCA also recommends these additions for the TMP:

- Require posting of directions to WRNMMC via Metro on the WRNMMC home page and on all patient/visitor handouts.
- Post signs showing the way to Metro on every street on the WRNMMC campus.
- Consider making transit subsidies for the Metro Smart Trip program available for all regular visitors, as well as all staff.

Appendix C-Section 3.2.2 - Programmed Improvements (Appendix C, p. 40)
The DEIS lists projects in planning/engineering or construction phases from the Maryland
Consolidated Transportation Program (2007- 2012) that could influence NNMC transportation
conditions in the long term.

EBCA Comment:

Enhancing public transit is critical to ensuring the long-term viability of this area for the hospital, local businesses, and residents alike. The Navy should consult with State planners (Maryland Transit Authority) who are working on east-west transit plans, both in lower Montgomery County (Purple Line) and further north (Corridor Cities Transitway). Both projects have potential direct benefits to WRNMMC. EBCA recommends that the Navy work with the State to better understand major transit infrastructure projects and how they may service WRNMMC and NIH and address future growth at these facilities.

Appendix C-Section 4.7 — Future Parking Provision: (p. 73 of Appendix C)
Under the BRAC expansion, there would be a net addition of about 1,800 parking paces.

EBCA Comments on Future Parking Provision:

- What will be the ratio of employee parking spaces to number of employees at WRNMMC at Bethesda once the BRAC expansion is complete?
- How does this ratio compare to NIH and other nearby federal agencies?